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[www.inteserra.com](http://www.inteserra.com)

September 25, 2018  
Via ECFS Filing

Talk America Services, LLC  
10802 Executive Center Drive Benton Building Suite 300  
Little Rock, Arkansas 72211

FRN: 0023997349  
Secretary, Federal Communications Commission  
Washington, DC 20554  
ATTN: Wireline Competition Bureau

**RE: Talk America Services, LLC**  
**Section 63.71 - Application to Discontinue Service**

Dear Sir or Madam:

Enclosed please find the Application to Discontinue Service submitted on behalf of Talk America Services, LLC. This filing is made pursuant to Title 47, Section 63.71.

A copy of this filing has been provided to the Service List provided as Exhibit B.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [Sthomas@inteserra.com](mailto:Sthomas@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas  
Consultant

cc: Rodney McDonald, FCC (Via Email)  
Kimberly Jackson, FCC (Via Email)  
Service List

tms: FCCx1805

Enclosures  
ST/im

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
Section 63.71 Application of )  
Talk America Services, LLC )  
to Discontinue Services )

File No. \_\_\_\_\_

**Section 63.71 Application of Talk America Services, LLC**

Talk America Services, LLC ("Talk America Services" or "Applicant"), hereby seeks authorization pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, to discontinue the provision of exchange access and/or interstate long distance services in certain locations in the District of Columbia and the state of Connecticut. This proposed discontinuance will affect approximately 14 existing customers.<sup>1</sup>

Applicant is considered a non-dominant telecommunications carrier with respect to all of its services, including those affected by the proposed discontinuance.

Talk America Services provides the following information pursuant to Section 63.71 of the Commission's rules:

*1. Name and corporate headquarters address of Carrier*

Talk America Services, LLC  
10802 Executive Center Drive  
Benton Building, Suite 300  
Little Rock, AR 72211

*2. Correspondence concerning this Application should be sent to:*

Sharon Thomas  
Consultant to Talk America Services, LLC  
Inteserra Consulting Group, Inc.  
151 Southhall Lane, Suite 450  
Maitland, FL 32751  
Telephone: 407-740-3031  
Facsimile: 407-740-0613  
E-Mail: [sthomas@inteserra.com](mailto:sthomas@inteserra.com)

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<sup>1</sup> Talk America Services also intends to disconnect local exchange service (dial tone and local usage), digital subscriber line ("DSL") internet access, and intrastate long-distance services to some of the affected customers. These services are not subject to the FCC's Section 214 discontinuance rules and are, therefore, not included as part of this request for authorization. However, customers are being notified regarding all of the services that are to be discontinued.

3. *Date of Planned Service Discontinuance, Reduction or Impairment:*

Talk America Services proposes to discontinue the services that are the subject of this Application on or about December 1, 2018, pending required federal and state regulatory approval of the discontinuance.

4. *Points of Geographic Areas of Service Affected:*

Talk America Services proposes to discontinue all of its telecommunications services in the District of Columbia and the state of Connecticut. Services provided to existing customers will be discontinued and services will no longer be offered to new customers following the proposed discontinuance.

5. *Brief Description of Types of Service Affected and Reason for Discontinuance:*

The table below identifies the types of telecommunications services and the current number of actively billing customers within the jurisdictions that will be impacted by the proposed discontinuance of service.

<b>State</b>	<b>Local Exchange/Exchange Access Lines and Intrastate/Interstate Long Distance (Bundled)</b>	<b>Intrastate and/or Interstate Long Distance Only</b>	<b>Total Affected Customers</b>
District of Columbia	4	0	4
Connecticut	2	8	10

The services subject to the FCC's jurisdiction that are the subject of this request for authorization are exchange access and interstate long distance.

The services are being discontinued because Talk America Services has a very small customer base in the affected jurisdictions and does not anticipate growth in its customer base. Consequently, it is not economically viable to continue to offer service in these jurisdictions. As described below, Talk America Services is providing all affected customers with ample notice of the discontinuance and has established a dedicated toll-free customer service number to support customers impacted by the discontinuance.

6. *Brief Description of Dates and Methods of Notice to All Affected Customers:*

The Applicant has provided written customer notice of the planned discontinuance in accordance with the requirements of section 63.71 (a) of the Commission's Rules. Notice was provided via 1<sup>st</sup> class U.S. mail to all affected customer on September 24, 2018. The notices are attached as Exhibit A.

A copy of this Application is being sent to the Connecticut Public Utilities Regulatory Authority, the District of Columbia Public Services Commission, the Connecticut governor's office, the District of Columbia mayor's office, and the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in Exhibit B.

#### **Conclusion**

Talk America Services, LLC respectfully requests that the Commission approve its Section 63.71 Application to discontinue the services described herein. Pursuant to Section 214(a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, Talk America Services understands that this application will be automatically granted on the 31<sup>st</sup> day after the Public Notice is released, with no Commission notification to the Company, unless the Commission has notified the Company that the grant will not be automatically effective.

Dated this 25th day of September, 2018.

By: /s/ Jeffrey R. Strenkowski

Jeffrey R. Strenkowski  
Vice President, Deputy General Counsel of  
Governmental Affairs  
Talk America Services, LLC

Sharon Thomas, Consultant to  
Inteserra Consulting Group, Inc.  
151 Southhall Lane, Suite 450  
Maitland, FL 32751  
Telephone: 407-740-3031  
Facsimile: 407-740-0613  
E-Mail: [sthomas@inteserra.com](mailto:sthomas@inteserra.com)

**Exhibit A**  
**Customer Notice**



2134 W Laburnum Ave. , Richmond, VA 23227

September 24, 2018

Customer Name  
Customer Address  
City, State Zip

**URGENT: Your telephone services will be impacted unless you take action!**

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and interstate long distance services in the District of Columbia on or after December 1, 2018, pending applicable regulatory approvals. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Talk America Services at 1-800-962-4772 as soon as possible to discuss your available options for an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider and could result in the complete loss of your dialtone, internet access and long distance services, including your telephone number, with no short-term ability to restore them. You will need to migrate your telephone service to an alternative provider **before December 1, 2018.**

It is your responsibility to continue to pay any invoices received from Talk America Services for the period that you remain on our service. We will refund any customer deposits and any outstanding credits on your account upon disconnection of your service. If you incur switchover fees from your new service provider, we will reimburse you for them upon receipt of an invoice showing valid switchover fees. Please contact us at 1-800-962-4772 for instructions on where to send any invoices for reimbursement of switchover fees.

A filing is being made with the FCC and with the District of Columbia Public Service Commission for approval of this discontinuance of service.

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the FCC releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Talk America Services, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Talk America Services' customer service can be reached at 1-800-962-4772 or [customercare@talkamericaservices.com](mailto:customercare@talkamericaservices.com) or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.

You can contact the Public Service Commission about this notice by calling (202) 626-5100 or writing to the Public Service Commission of the District of Columbia at 1325 G Street N.W., Suite 800, Washington, DC 20005. You may also contact the Office of the People's Counsel by calling (202) 727-3071 or writing 1133 15<sup>th</sup> Street N.W., Suite 500, Washington, DC 20005.

Sincerely,  
Talk America Services, LLC



2134 W Laburnum Ave. , Richmond, VA 23227

September 24, 2018

Customer Name  
Customer Address  
City, State Zip

**URGENT: YOU MUST CHOOSE A NEW LOCAL TELEPHONE SERVICE PROVIDER BY NOVEMBER 1, 2018**

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and intrastate and interstate long distance services in the state of Connecticut on or after December 1, 2018, pending applicable regulatory approvals. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services including the loss of your local telephone service**, please contact Talk America Services at 1-800-962-4772 as soon as possible to discuss your available options for an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider and could result in the **complete loss of your dialtone, internet access and long distance services**, including your telephone number, with no short-term ability to restore them. You will need to migrate your telephone service to an alternative provider by **November 1, 2018**. A list of most local telephone service providers maybe found in your local telephone directory.

A filing is being made with the FCC and with the Connecticut Public Utilities Regulatory Authority for approval of this discontinuance of service.

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the FCC releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Talk America Services, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Talk America Services' customer service can be reached at 1-800-962-4772 or [customercare@talkamericaservices.com](mailto:customercare@talkamericaservices.com) or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.

Sincerely,  
Talk America Services, LLC



**Exhibit B – Service List**

Mr. Jeffery R. Gaudiosi, Executive Secretary Connecticut Public Utilities Regulatory Authority Ten Franklin Square New Britain, CT 06051	Office of the Governor State Capitol 210 Capitol Avenue Hartford, Connecticut 06106
Ms. Brinda Westbrook-Sedgwick, Commission Secretary Public Service Commission of District of Columbia 1325 G ST NW Suite 800 Washington, DC 20005	Office of the Mayor John A. Wilson Building 1350 Pennsylvania Avenue, NW Washington, DC 20004
Department of Defense Attn: Special Assistant for Telecommunications Pentagon Washington, DC 20301	

**CERTIFICATE OF SERVICE**

STATE OF FLORIDA        )

COUNTY OF ORANGE        )

On this date, September 25, 2018, the foregoing Section 63.71 Application was sent by U.S. Mail postage prepaid to the service list contained in Exhibit B.

/s/Keith Rice

For Shipping Department  
Inteserra Consulting Group, Inc.